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September 7, 2021

By Electronic Filing Only

Honorable Douglas E. Arpert  
United States Magistrate Judge  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *State of New Jersey v U.S. Department of Education*  
Civil Action No. 19-18036 (BRM) (DEA)

Dear Judge Arpert:

I write with the consent of opposing counsel, AUSA J. Andrew Ruymann, to update Your Honor on this matter. In the letter to Your Honor on April 6, 2021, the parties requested to update Your Honor on the status of the production and the next steps, if any, in the production process within 5 months.

At this time, the Department of Education has released over 7,000 pages of responsive documents to the State. The State continues its review of these releases and has submitted a follow-up request for production of attachments to emails that were referenced but not included in the released documents. Because the parties continue to work cooperatively to release and review additional document requests, Granted, we request to continue this process and provide an update to the Court in 3 months, on December 6, 2021, detailing any further production schedule or requesting an initial scheduling conference.

Thank you for your consideration.

Respectfully submitted,  
ANDREW J. BRUCK  
ACTING ATTORNEY GENERAL OF  
NEW JERSEY

By: /s/ Erin Hodge  
Erin Hodge  
*Deputy Attorney General*

cc: J. Andrew Ruymann, Assistant U.S. Attorney

So Ordered on this 8th day of September, 2021.

  
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**DOUGLAS E. ARPERT**  
**UNITED STATES MAGISTRATE JUDGE**